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April 24, 2015

Hon. Kiyo A. Matsumoto
Eastern District Court of New York
Chambers Room S905
225 Cadman Plaza East
Brooklyn, New York 11201

Re: In re: Julian Salim
EDNY Case No. 15-cv-01787-KAM
Adversary Case No. 13-01442
Our File No. L-VWCREDIT.15.00168

Dear Judge Matsumoto:

Our office represents Respondent, VW Credit, Inc. ("Respondent"), in connection with the above-referenced bankruptcy appeal. Respondent intends on moving under Bankruptcy Rules 8001(a), 8002 and 8011 to dismiss the appeal as not conforming to the requirements of the Bankruptcy Rules and for being filed untimely. Respondent intends to argue that as result of the appeal being filed untimely, the Court lacks jurisdiction over the appeal under 28 U.S.C. § 158. Respondent will also seek a stay of the appeal proceedings, including briefing, pending a determination by the Court of Respondent's Motion to Dismiss.

In accordance with Section IV(C)(1)(B) of your Honor's Rules, Respondent proposes the following briefing schedule for its motion:

- (1) Respondent's motion papers shall be filed and served within fourteen (14) days after entry of your Honor's approval of a briefing schedule;
- (2) In accordance with Appellant's counsel's request to the Bankruptcy Court for an extension of time to proceed with the appeal for four (4) weeks from April 16, 2015 for health reasons (See Case No. 13-01442, Doc. No. 54), Respondent proposes Appellant's opposition papers shall be filed and served within thirty (30) days from the date of filing and service of the motion; and
- (3) Respondent's reply papers shall be filed and served seven (7) days after filing and service of Appellant's opposition papers.

Any alterations made by the Court to the proposed briefing schedule will be acceptable to Respondent.

In accordance with Section IV (B) of your Honor's Rules, Respondent understands that the referenced motion does not require a pre-motion conference, as the motion relates

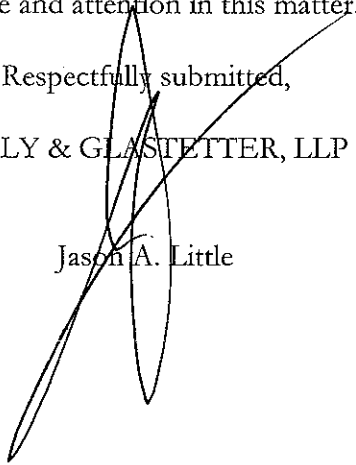
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to a bankruptcy appeal. If Respondent is mistaken in its interpretation, please accept this correspondence as Respondent's request for a pre-motion conference in accordance with Section IV(B) of your Honor's rules.

We thank the Court for its time and attention in this matter.

Respectfully submitted,
DEILY & GLASTETTER, LLP

Jason A. Little

A large, stylized handwritten signature in black ink, which appears to be 'JAL', is written over the typed name and firm name.

JAL/jp
cc: Philip Jaffe, Esq.